

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**ROTHSCHILD CONNECTED  
DEVICES INNOVATIONS, LLC**

**V.**

**ADS SECURITY L.P.**

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**C.A. NO. 2:15-CV-01431-JRG-RSP**

**AFFIDAVIT OF LEIGH ROTHSCCHILD**

BEFORE ME, the undersigned authority, personally appeared Leigh Rothschild (NAME OF AFFIANT), who, being by me duly sworn, deposed as follows:

My name is Leigh Rothschild. I am of sound mind and capable of making this affidavit.

I am a resident of the State of Florida and have been so for 49 years. I am a single father with full custody of my minor children therefore I seldom leave the state. It is inconvenient for me to leave my infant and young children. I own no real or personal property in Texas. I am the sole member of Rothschild Connected Devices Innovations, LLC. (RCDI). I have never been a party to this suit. RCDI brought this suit in its name only. It retained counsel in its name only. Any actions by me related to this suit were done so as an officer or agent of RCDI and not in any individual capacity. RCDI maintains separate back accounts and records from me. It had an office in Texas that it leased in its name, not mine. All corporate formalities were maintained by RCDI according to Texas Corporate Law and Federal Tax Law,

At no time did I have travel to Texas to conduct any business of RCDI. The only time I was in Texas on RCDI business was at the show cause hearing in January before the magistrate judge.

Attached to this Affidavit (Exhibit A) is a copy of the summons and counterclaim from ABS. I did not sign for this mail but the security guard for my property did. No person handed it to me and it appears to be certified mail from the lawyer representing ABS. No sheriff, marshal, constable, or process server delivered this to me nor was it hand delivered to me by anyone.

**EXHIBIT B**

**This affidavit is signed without notarization in conformance with The Texas Civil Practice & Remedies Code, §132.001.**

"My name is Leigh Mitchell Rothschild my date of birth is December 30, 1951

and my address is 1574 NE Quayside Terrace Miami, Florida 33138

and America.

(Country)

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Dade County, State of Florida on the 9th day of April 2019



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Declarant"

**(If Declarant cannot provide the information above, then this affidavit must be signed and notarized below)**

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Affiant